

1 RENE L. VALLADARES
2 Federal Public Defender
3 State Bar No. 11479
4 MARGARET W. LAMBROSE
5 Assistant Federal Public Defender
6 Nevada State Bar No. 11626
7 411 E. Bonneville, Ste. 250
8 Las Vegas, Nevada 89101
9 (702) 388-6577/Phone
10 (702) 388-6261/Fax
11 Maggie_Lambrose@fd.org
12 Attorney for Albert Franco

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Case No. 2:18-cr-00356-APG-DJA

17 Plaintiff,

18 v.
19 **STIPULATION TO CONTINUE
20 SENTENCING HEARING**
21 (First Request)

22 ALBERT FRANCO,

23 Defendant.

24 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
25 Trutanich, United States Attorney, and Peter S. Levitt, Assistant United States Attorney,
counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
and Margaret W. Lambrose, Assistant Federal Public Defender, counsel for Albert Franco, that
the Sentencing Hearing currently scheduled on November 14, 2019, be vacated and continued
to a date and time convenient to the Court, but no sooner than thirty (30) days.

26 This Stipulation is entered into for the following reasons:

- 27 1. The additional time requested is to allow counsel for the defense to collect
28 additional records and conduct investigation in preparation for sentencing.
29
30 2. The defendant is not in custody and agrees with the need for the continuance.

1 3. The parties agree to the continuance.
2
3

This is the first request for a continuance of the sentencing hearing.

DATED this 25th day of September, 2019.

RENE L. VALLADARES
Federal Public Defender

/s/ *Margaret W. Lambrose*
By _____
MARGARET W. LAMBROSE
Assistant Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

/s/ *Peter S. Levitt*
By _____
PETER S. LEVITT
Assistant United States Attorney

1
2 **UNITED STATES DISTRICT COURT**
3 **DISTRICT OF NEVADA**

4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 ALBERT FRANCO,

8 Defendant.

9
10 Case No. 2:18-cr-00356-APG-DJA

11 **ORDER**

12
13 IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for
14 November 14, 2019 at 10:30 a.m., be vacated and continued to February 4, 2020 at the hour of
15 9:30 a.m. in Courtroom 6C; or to a time and date convenient to the court.

16 DATED this 25th day of September, 2019.

17
18 
19 _____
20 UNITED STATES DISTRICT JUDGE